

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
KEVLEENA SHENESE WEBB	)	Case No. 20-30776-KRH
	)	Chapter 13
Debtor	)	

**DEBTOR'S RESPONSE TO OBJECTION TO CHAPTER 13 PLAN**

COMES NOW the Debtor, by counsel, and as and for Debtor's Response to Objection ("Objection") to Plan filed by Afrikka Ennis and LaVaniel Ennis, Jr. ("Ennis"), states as follows:

1. The allegations contained in Paragraph 1 of the Objection are admitted.
2. The allegations contained in Paragraphs 2 of the Objection are denied as phrased.
3. The Debtor is without sufficient information to admit or deny the allegations contained in paragraph 3 of the Objection and therefore denies the same.
4. The allegations contained in Paragraphs 4, 5, and 6 of the Objection are denied and the Debtor demands strict proof thereof.
5. The gravamen of the Objection is that the Debtor filed this case in bad faith. On March 4, 2020 the Court conducted a hearing on a Motion to Impose Stay filed by the Debtor, which Motion and Notice of Hearing were mailed to the Ennises on February 19, 2020.
6. At said hearing the Debtor provided testimony under oath concerning the circumstances of the filing of this and prior cases. At the conclusion of the hearing the Court made a finding that the filing of this case was in good faith as to all creditors and ordered that the

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automatic stay of 11 U.S.C. § 362(a) be imposed and extended without condition as to Debtor, her property, all creditors, and property of the bankruptcy estate throughout the pendency of this case.

7. Based on the foregoing, the Ennises are collaterally estopped from re-litigation the issue of good faith in the form of their Objection, and the Objection should be overruled.

8. On March 30, 2020 the Court entered an Order on the Ennises' Motion for Relief from the Automatic Stay that fully addresses and resolves the exact issues contained in the Objection, rendering the Objection moot.

WHEREFORE, the Debtor respectfully requests that the Objection to Plan filed by the Ennises be overruled, and for such other relief as the Court deems appropriate.

KEVLEENA SHENESE WEBB

By: /s/ James E. Kane  
Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof, and I mailed a copy by first class mail, postage pre-paid to:

Afrikka L. Ennis  
LaVaniel Ennis, Jr.  
8218 Tattertron Trail  
North Chesterfield, VA 23237

/s/ James E. Kane  
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